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13 Loan No. xxxxxx3920 / Our File No. 12-03-39857-NV

14 Attorney for Secured Creditor
15 Deutsche Bank National Trust Company, as Trustee for GSAA Home Equity Trust 2006-8, Asset-
16 Backed Certificates, Series 2006-8

17 UNITED STATES BANKRUPTCY COURT
18 DISTRICT OF NEVADA

19 In re:

20 NICOLAS LARA
21 RITA LARA

22 Debtor(s)

23 CHAPTER 13
24 BANKRUPTCY NO.: 12-11954-MKN
25 DATE: May 17, 2012
TIME: 01:30 PM

**AMENDED OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER
13 PLAN WITH CERTIFICATE OF SERVICE**

16 Deutsche Bank National Trust Company, as Trustee for GSAA Home Equity Trust
17 2006-8, Asset-Backed Certificates, Series 2006-8 is a Secured Creditor in the above-entitled
18 bankruptcy proceeding and hereby submits the following Objections to the Confirmation of that
19 certain Chapter 13 Plan proposed by Debtors.

- 20 1. This objecting Creditor holds a security interest in the form of a First deed of trust on the
21 property located at 632 Lincoln Road, Las Vegas, NV 89110.
- 22 2. As of the filing date of the instant bankruptcy petition on February 23, 2012, the amount in
23 default pre-petition was \$3,787.19; representing Three (3) monthly payments, late charges, NSF
24 charges (if any); advances for taxes and insurance (if any); and any foreclosure or Trustee's fees
25 accrued with respect to the default.

1 3. The plan does not currently set forth the necessary amount for plan payment and does not
2 propose to pay the arrearages to Deutsche Bank National Trust Company, as Trustee for GSAA
3 Home Equity Trust 2006-8, Asset-Backed Certificates, Series 2006-8 in a reasonable manner.

4 4. The Debtors are currently in contravention of 11 U.S.C. § 1322(b)(5) and the plan should
5 not be confirmed as proposed.

6 Any plan proposed by the Debtors must accommodate the necessary pre-petition arrearages as
7 reflected above in order to be reasonable and correct. Additionally, any plan proposed by the
8 Debtor should provide that payments to Deutsche Bank National Trust Company, as Trustee for
9 GSAA Home Equity Trust 2006-8, Asset-Backed Certificates, Series 2006-8 begin as expediently
10 as possible and that the pre-petition arrearages be paid in their entirety prior to the expiration of
11 sixty months.

12 WHEREFORE, Secured Creditor prays as follows:

- 13 (1) That confirmation of the proposed Chapter 13 plan be denied unless the above-
14 referenced numbers can be accommodated;
15
16 (2) For attorneys fees and costs incurred herein;
17
18 (3) For dismissal of the Chapter 13 proceeding;
19
20 (4) For any and all other relief that this Court deems appropriate.

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 Attorneys for Secured Creditor
 Deutsche Bank National Trust Company

CERTIFICATE OF SERVICE

The undersigned hereby declares and certifies that on April 27, 2012, a copy of the Secured Creditors AMENDED OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN WITH CERTIFICATE OF SERVICE was served on the parties through the following means:

Electronically mailed to:

COUNSEL FOR DEBTOR(S) TRUSTEE
NARRAH F. NEWARK, ESQ. Kathleen A. Leavitt
BK@nnbklaw.com courtsecf3@las13.com

Depositing a copy in the United States Mail, postage prepaid and addressed to:

Nicolas Lara, Rita Lara
632 Lincoln Rd.
Las Vegas, NV 89110

I declare under penalty of perjury that the foregoing is true and correct.

/s/ R.DeSimone

An employee of THE COOPER CASTLE LAW FIRM